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5 *Attorneys for Defendant*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 NORI EVANS, an individual,  
10 Plaintiff,

11 vs.

12 UNIVERSITY MEDICAL CENTER a.k.a  
UNIVERSITY MEDICAL CENTER OF  
13 SOUTHERN NEVADA a.k.a. UMC, a  
political subdivision of Nevada;; DOES I-V;  
14 ROES VI-X,  
15 Defendants.

CASE NO: 2:15-cv-01136-MMD-CWH

**STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR  
PLAINTIFF'S RESPONSE TO  
DEFENDANT'S SECOND MOTION  
FOR SUMMARY JUDGMENT (ECF  
NO. 82) AND DEFENDANT'S  
RESPONSE TO PLAINTIFF'S  
MOTION FOR RECONSIDERATION  
(ECF NO. 84)  
[SECOND REQUEST]**

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, NORI  
18 EVANS and Defendant, UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA, by  
19 and through their respective undersigned counsel of record, that Plaintiff shall have two (2)  
20 additional days to file and serve her Response to Defendant's Second Motion for Summary  
21 Judgment (ECF No. 82). The parties agree the deadline for filing Plaintiff's Response shall  
22 now be Friday, June 1, 2018.

23  
24 IT IS ALSO STIPULATED AND AGREED that Defendant shall have two (2)  
25 additional weeks to file and serve its response to Plaintiff's Motion for Reconsideration of  
26 Interlocutory Order (ECF No. 84). The parties agree the deadline for filing Plaintiff's  
27 Response shall be due Monday, June 11, 2018.

1 This is the parties Second Request for an extension.

2 The reasons for this request are the following:

- 3 1. Defendant's counsel was involved in a car accident that was caused by an  
4 apparent intoxicated motorist. As a result, he has been required to take a number of  
5 days off in order to seek treatment, including actively attending physical therapy  
6 appointments and diagnostic testing, in order to recover. He is also expected to  
7 miss additional time from work as the treatment continues.
- 8 2. The parties sought to extend these deadlines on May 11, 2018 (ECF 85), but are  
9 merely requesting two (2) additional days for Plaintiff to file and serve her  
10 Response to Defendant's Second Motion for Summary Judgment (ECF No. 82) and  
11 two (2) additional weeks for Defendant to file and serve its response to Plaintiff's  
12 Motion for Reconsideration of Interlocutory Order (ECF No. 84).
- 13 3. This Stipulation is entered into in good faith and not to cause undue delay.
- 14  
15  
16

17 DATED this 1<sup>st</sup> day of June, 2018.

18 **LAW OFFICE OF DAN M. WINDER, P.C.**

19  
20 /s/ Kristina Miletovic

21 DAN M. WINDER, ESQ.

22 Nevada Bar No. 001569

23 KRISTINA MILETOVIC, ESQ.

24 Nevada Bar No. 14089

3507 W. Charleston Boulevard

Las Vegas, Nevada 89102

*Attorney for Plaintiff*

DATED this 1<sup>st</sup> day of June, 2018.

**PITEGOFF LAW OFFICE INC.**

/s/ Jeffrey I. Pitegoff

JEFFREY I. PITEGOFF, ESQ.

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330 East. Charleston Boulevard, Suite 100

Las Vegas, Nevada 89104

*Attorney for Defendant,*

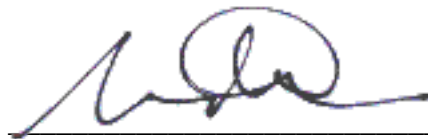
*UNIVERSITY MEDICAL CENTER*

**ORDER**

**IT IS HEREBY ORDERED** that Plaintiff shall have until Friday, June 1, 2018 to file her Response to Defendant's Second Motion for Summary Judgment (ECF No. 82).

**IT IS ALSO HEREBY ORDERED** that Defendant shall have until Tuesday, June 11, 2018 to file its Response to Plaintiff's Motion for Reconsideration of Interlocutory Order (ECF No. 84).

**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

DATED: June 1, 2018

1 **CERTIFICATE OF SERVICE**

2 I DO HEREBY CERTIFY that service of the foregoing: **STIPULATION AND**  
3 **ORDER TO EXTEND DEADLINES FOR PLAINTIFF'S RESPONSE TO**  
4 **DEFENDANT'S SECOND MOTION FOR SUMMARY JUDGMENT (ECF NO. 82)**  
5 **AND DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR**  
6 **RECONSIDERATION (ECF NO. 84) [SECOND REQUEST]** was made this \_\_\_\_\_ day  
7 of June, 2018, by:

8 [ ] **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with  
9 postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada,  
addressed as set forth below.

10 [ ] **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the  
11 fax number(s) set forth below on this date before 5:00p.m., pursuant to EDCR Rule  
7.26(a). A printed transmission record is attached to the file copy of this document.

12 [X] **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic CM-ECF  
13 filing services the document(s) listed above to the Counsel set forth below on this  
14 date pursuant to FRCP Rules.

15 Kristina Miletovic, Esq.  
16 Dan M. Winder, Esq.  
17 Scott C. Dorman, Esq.  
18 LAW OFFICE OF DAN M. WINDER, P.C.  
19 3507 W. Charleston Boulevard  
20 Las Vegas, NV 89102  
21 *Attorneys for Plaintiff*

22 [ ] **BY ELECTRONIC MAIL:** by transmitting via the internet the document(s) listed  
23 above to the email address listed in the Nevada Legal Directory to Counsel set forth  
24 below on this date.

25 /s/ Teresa M. Estrada  
26 An Employee of PITEGOFF LAW OFFICE INC.  
27